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15 *Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

17 MARIA TSATAS, an individual; LEONIDAS  
18 VALKANAS, as trustee of the KEET TRUST  
dated August 1, 2015; RAYMOND BARAZ,  
19 an individual; PASCAL ABDALLAH, an  
individual; JIMMY TSOUTSOURAS, an  
20 individual; FOTINI VENETIS, an individual;  
NICHOLAS TSOUTSOURAS, an individual;  
21 CONNIE TSOUTSOURAS, an individual;  
RAYMONDE KANHA, an individual;  
22 ALFRED BEKHIT, an individual; JACQUEZ  
ELBAZ, an individual; MARTINE  
23 BENEZRA, an individual; JAMES P.  
CARROLL, an individual; DAVID CHIN, an  
24 individual; JENNIFER MILLS, an individual;  
PAUL SUBLETT, an individual; ANDREW  
25 SUBLETT, an individual; MANOLIS  
KOSTAKIS, an individual; ESTHER  
26 GEORGAKOPOULOS, an individual;  
EVAGELIA KOSTAKIS, an individual;  
27 DENIS PARSONS, an individual; SOFIA  
KARDARAS, an individual; JIMMY  
28 ASMAKLIS, an individual; CORRADINO  
GALUPPO, an individual; DENIS KOPITAS.

CASE NO.: 2:20-cv-2045-

**STIPULATION FOR EXTENSION OF TIME  
FOR DEFENDANTS TO RESPOND TO  
COMPLAINT TO JANUARY 22, 2021**

**(First Request)**

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an individual; TERRY TSATAS, an individual; GEORGE TSATAS, an individual; PANAGIOTA TSATAS, an individual; OURANIA TSATAS, an individual; KIRIAKOS PRIMBAS, an individual; EVANTHIA PRIMBAS, an individual; PATRICK AYOUB, an individual; MICHAEL BESCEC, an individual; ERNEST LEBOEUF, an individual; PHILIPPE LEGAULT, an individual; EFTIHIOS LITSAKIS, an individual; GIOVANNI MONCADA, an individual; MARC RIEL, an individual; JARADEH SALIM, an individual; HANI HAMAM, an individual; CONSTANTIN ZISSIS, an individual; BESSIE PEPPAS, an individual; NIKI PALIOVRAKAS, an individual,

Plaintiffs,

v.

AIRBORNE WIRELESS NETWORK, INC., a Nevada Corporation; MICHAEL J. WARREN, an individual; J. EDWARD DANIELS, an individual; MARIUS DE MOS, an individual; JASON DE MOS, an individual; ROBERT BRUCE HARRIS, an individual; KELLY KABILAFKAS, an individual; and APCENTIVE, INC., a Nevada Corporation,

Defendants.

Plaintiffs and defendants, by and through the undersigned counsel of record, hereby stipulate to the following facts:

1. All defendants except for Jason De Mos and Marius De Mos have been served with the summons and complaint. The undersigned counsel for defendants has agreed to accept service of the summons and complaint on behalf of defendants Jason De Mos and Marius De Mos.
2. The current response date for defendant Airborne Wireless Network, Inc. is December 22, 2020. No other defendant's response to the complaint has come due, but will at various times between December 23, 2020 and December 30, 2020.
3. The defendants may have common perceived deficiencies they would like to meet and

confer about with plaintiffs prior to filing Motion(s) to Dismiss.

4. Counsel for the Parties wish to enjoy the holiday season without the burden of meeting and conferring, amending the pleadings, or drafting Motion(s) to Dismiss.
5. This is the first stipulation for an extension of time for defendants to respond to the complaint.
6. Plaintiffs and defendants, by and through the undersigned counsel of record, agree to extend the time for all defendants to file a responsive pleading to January 22, 2021.
7. The undersigned counsel for the defendants consents to having counsel for the plaintiffs electronically sign the present stipulation on his behalf.

IT IS SO STIPULATED.

DATED: December 22, 2020

Respectfully submitted.

SHUMWAY VAN  
NOVIAN & NOVIAN, LLP

By: /s/ Andrew B. Goodman

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[signatures on the following page]

1 DATED: December 22, 2020

2 Respectfully submitted.

3 GREENSPOON MARDER LLP  
4 THE MALONEY FIRM, APC

5  
6 By: /s/ Gregory M. Smith  
7 PHILLIP SILVESTRI, ESQ. #11276  
8 3993 Howard Hughes Parkway, Suite 400  
9 Las Vegas, Nevada 89169

10 PATRICK M. MALONEY, ESQ. (California Bar  
11 No. 197844)

12 GREGORY M. SMITH, ESQ. (California Bar No.  
13 259971)

14 *Attorneys for Defendants*

15 ORDER

16 IT IS SO ORDERED

17 DATED: 3:05 pm, December 29, 2020

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19 BRENDA WEKSLER  
20 UNITED STATES MAGISTRATE JUDGE  
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